Supreme Court, U. S.
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IN THE

Supreme Court of the United States

OCTOBER TERM, 1978

No. 78-855

HELEN A. COHEN,

Petitioner,

vs.

ILLINOIS INSTITUTE OF TECHNOLOGY, AN ILLINOIS NOT-FOR-PROFIT CORPORATION, JAMES J. BROPHY, JOHN T. RETTALIATA, AND MAYNARD P. VENEMA,

Respondents.

REPLY TO BRIEF IN OPPOSITION TO PETITION FOR A WRIT OF CERTIORARI.

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The only response merited by the Brief in Opposition is to note that the respondents' listing (Br. Op. p. 4) of the allegations in our complaint as to State Aid and support of IIT omits reference to the State Grant Program and the State Guaranteed Loan Program (App. B, at 11a, n. 9).

These two programs happen to be the principal source of State financial support to IIT.

As for the other issues raised or not raised in the Brief in Opposition—whether we have "erroneously" or "misleadingly" stated the facts (Br. Op. pp. 3, 4), whether there is a direct literal conflict with *Conley* (Br. Op. p. 4), whether there is

"no conflict" among the circuits on the State Action Test for § 1983 (Br. Op. p. 7), or whether we have made the fatuous arguments attributed to us for § 1985(3) (Br. Op. p. 9)—can be resolved merely by reference to the record, the opinions, and to our Petition.

CONCLUSION.

This case is a perfect vehicle for this Court to consider all three of the Questions Presented. The petition should be granted.

Respectfully submitted,

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